

Beveridge & Diamond, P.C.,  
600 University St., Ste. 1601  
Seattle, WA 98101  
Attn: Rachel Roberts

Ravi Sangra  
Remedial Project Manager  
U.S. Environmental Protection Agency  
1200 6th Ave., Suite 900 MS E&L-122  
Seattle, WA 98101



Documents #1 to 37  
General Electric's responses  
to EPA's requests for  
the East Waterway  
operable unit of the  
Harbor Island Superfund  
Site under 42 U.S.C. Sec 9604(a)

USB  
2.0

COMPATIBLE  
WITH USB 3.0<sup>2</sup>  
AVEC L'USB 3.0<sup>2</sup>

Attaché 4





Loren R. Dunn  
600 University Street, Suite 1601  
Seattle, WA 98101  
+1.206.315.4810  
ldunn@bdlaw.com

August 31, 2020

**VIA HAND DELIVERY**

Ravi Sanga  
Remedial Project Manager  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, MS ECL-122  
Seattle, WA 98101  
[sanga.ravi@epa.gov](mailto:sanga.ravi@epa.gov)

Re: General Electric's responses to EPA's requests for the East Waterway Operable Unit of the Harbor Island Superfund site under 42 U.S.C. § 9604(e)

Dear Mr. Sanga,

Enclosed please find:

- A hard copy of General Electric ("GE's") responses to EPA's requests for the East Waterway Operable Unit of the Harbor Island Superfund site under 42 U.S.C. § 9604(e)
- A hard copy of the accompanying Document Index.
- A USB containing the Document Index and responsive documents.

A hard copy of Mr. Antonoff's declaration will arrive at EPA's Seattle office by U.S. mail.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Loren R. Dunn".

Loren R. Dunn

Encl.

This document is the response of General Electric Company (“GE” or “the Company”) to the letter from Sheila Fleming, Acting Director, Superfund & Environmental Management Division of Region 10, U.S. Environmental Protection Agency, dated March 10, 2020.

It contains GE’s responses to EPA’s Request for Information and Documents, East Waterway Operable Unit (“EWOU”), Harbor Island Site (the “104(e) Request”), which was issued on that same date.

### **Objections**

GE hereby offers the following General Objections to the 104(e) Request:

1. GE objects to the Instructions, Definitions, and Questions as overbroad and seeking information that is beyond the scope of materials and information which EPA is authorized to request under 42 U.S.C. § 9604(e).
2. GE objects to the Instructions, Definitions, and Questions as unduly burdensome and demanding that GE undertake investigative activities that are unreasonable, unnecessary and/or beyond the scope of EPA’s authorized powers under 42 U.S.C. § 9604(e).
3. GE objects to the Instructions, Definitions, and Questions to the extent that they purport to require GE to undertake independent investigations into public records or other sources which are not within GE’s possession or control.
4. GE objects to the Instructions, Definitions, and Questions to the extent that they purport to require GE to produce information and/or documents that are not within its possession or control.
5. GE objects to the Instructions, Definitions, and Questions to the extent that they could be read to require GE to produce information and/or documents that are attorney-client privileged, or are subject to attorney work product protections.

### **Responses to EPA Questions**

GE has undertaken a reasonable investigation to find and to provide information which is responsive to EPA’s 104(e) Request. The following is accurate and complete, to the best of GE’s knowledge.

GE’s response has been hampered by the inaccessibility of some records and materials due to the Covid 19 pandemic. To the extent new information is later discovered, GE is aware of EPA’s request that these responses be updated, and will do so as needed.

In response to the Overview, Instructions, Definitions, and Questions stated in the 104(e) Request, and subject to GE’s above-stated objections, GE states as follows:

**1. Identification and Association with Subject Property**

- a. Provide the full legal name and mailing address of Respondent.**

**Response:**

General Electric Company  
1 River Road – Bldg 5-7W  
Schenectady, NY 12345 USA

- b. For each person answering these questions on behalf of Respondent, provide that person's:**

**i. full name;**

**ii. title;**

**iii. business address and electronic mail address; and**

**iv. business telephone number.**

**Response:**

Thomas D. Antonoff  
Senior Project Manager, Environmental Remediation  
[tom.antonoff@ge.com](mailto:tom.antonoff@ge.com)  
Phone Number: 518.338.4142  
General Electric Company  
1 River Road – Bldg 5-7W  
Schenectady, NY 12345 USA

Eric Merrifield  
Executive Counsel  
Global Operations - Environment, Health & Safety  
[Eric.merrifield@ge.com](mailto:Eric.merrifield@ge.com)  
Phone Number: 518.862.2708  
General Electric Company  
1 River Road – Bldg 5-7W  
Schenectady, NY 12345 USA

- c. If Respondent wishes to designate an individual for receiving future correspondence from the EPA concerning the EWOU, please indicate so here by providing that individual's name, mailing address, electronic mail address, telephone number, and fax number.

**Response:**

Tom Antonoff  
tom.antonoff@ge.com  
Phone Number: 518.338.4142  
General Electric Company  
1 River Road – Bldg 5-7W  
Schenectady, NY 12345 USA

- d. Provide the address of each Subject Property, the time period when Respondent held any ownership or other interest in the Subject Property, and the type of interest held.

<b><u>Site No.</u></b>	<b>Address</b>	<b>Time Period Interest Held</b>	<b>Type of Interest Held</b>
1.	2 South Hanford Street	Unknown, at least 1960–1970	Unknown
2.	1212 1st Avenue S.	Unknown, at least 1937–1960	Lease
3.	550 South Idaho Street	Unknown, at least 1960–1970	Unknown
4.	3422 1st Avenue South, aka “Enterprises NW”	1945–1972  2011–2016	1945–1972: Lease  6/6/2011–6/19/2016: Fee
5.	1508 4th Avenue S.	Unknown	Unknown
6.	440 South Holgate Street	Unknown, shown in a 1939 photo	Lease
7.	710 2nd Avenue	Unknown, at least 1960–1970	Unknown
8.	5000-5002 E. Marginal Way	At least 1956–1970	Unknown
9.	37 S. Hudson Street	1954–4/28/1987	Unknown

- e. **Identify all materials used or created by Respondent's activities or operations at each Subject Property.**

**Response:**

GE objects to Request 1(e) as overbroad and unreasonably burdensome. Subject to these objections, specific information about materials used or created at the majority of the facilities listed above is lacking. Responses specific to Sites 4 and 9 are below.

**Site 4. Enterprises NW Property**

Materials used in GE's operations at the Enterprises Northwest facility historically included electrical equipment under servicing and repair. Additionally, various chemicals were used in the electrical equipment servicing process, such as PCBs, chlorobenzene and petroleum products. Material Safety Data Sheet are not available because the operations were closed in 1972 and no chemical records were retained.

**Site 9: 37 South Hudson Street**

Based on our investigation, and to the best of our knowledge, this site produced electrical panels fabricated from sheet metal. Operations included sheet metal cutting, forming, metal machining, painting (both liquid and powder coating), chemical plating (silver on copper), and final assembly of fabricated metal parts.

- f. **Provide copies of all documents regarding the ownership or environmental conditions of the Subject Property, including, but not limited to, deeds, sales contracts, leases, surveys, investigations, sampling, reports, blueprints, "as-builts," and photographs.**

**Response:**

GE objects to Request 1(f) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information: Documents concerning the property interests and environmental conditions at the properties are identified in the attached Document Index as Document Numbers 1–6, 10–19, 21–30, 33–35, and 37.

- g. **Provide information on the condition of the Subject Property when purchased or at the beginning of the relevant time period; describe the source, volume, and content of any fill used during the construction of the buildings, including waterside structures such as seawalls, wharves, docks, or marine ways.**

**Response:**

GE objects to Request 1(g) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information:

#### **Site 4. Enterprises NW Property**

GE is aware that the Enterprises NW property is filled tidelands, as is the entire south Seattle neighborhood. During GE's operation at the property, GE did not, to GE's knowledge, perform any filling on the property. GE began operations in 1945; aerial photographs from 1944 and 1946 indicate that the site was filled at the time of the photographs.

In the context of implementing a remedial action at the site, GE excavated 33,600 tons of the fill at the property. The content of the fill is described in Document No. 27, and included dredged fill materials mixed with demolition debris, railroad ties and rails, and other industrial materials from historical operations in the vicinity of the property. In many locations the fill was excavated down to the elevation of the historical tide flat prior to settlement in the area. Upon completing the remedial action, GE re-filled the property with approximately 33,500 tons of certified clean fill. The sources and volumes of the re-filling material are described in Document No. 27, Construction Report, Former Enterprises NW Property Remediation, Voluntary Cleanup Program NW 2117, Seattle, Washington, Amec Foster Wheeler Environment & Infrastructure, Inc., April 2016.

- h. **Describe the activities or operations at each Subject Property including:**
- i. **the date such activities or operations commenced and concluded; and**
  - ii. **the types of activities or operations performed at each Subject Property, including but not limited to the use, storage, or disposal of any materials in an outdoor location.**

#### **Response:**

GE objects to Request 1(h) as overbroad and unreasonably burdensome. GE does not currently have information about the activities or operations at each subject property. Subject to these objections, GE provides the following information:

#### **Site 1. 2 Hanford Street**

See answer to 1(d), above. In addition, the 2 Hanford Street location is mentioned as a service location for Communication Products, in a 1960 Diary and in a 1970 Business Directory. The 2 Hanford Street location is also listed as a service location for Technical Products Operation Services in a 1970 Business Directory.

#### **Site 2. 1212 1<sup>st</sup> Ave South**

See answer to 1(d), above. In addition, the 1212 1<sup>st</sup> Ave South location appears in both a 1960 Diary and a 1970 Business Directory as a location for Air Conditioning, GE Supply Co., Major Appliance Sales-Service and as a service shop for TV Receiver Sales-Service.



**Site 3. 550 South Idaho Street**

See answer to 1(d), above. In addition, “550 W. Idaho Street,” which likely referred to 550 South Idaho Street, appears in a 1960 Diary as a location for Aircraft Assembly Turbine, Apparatus Aviation, Flight Propulsion, Light Military Electric, and Receiving Tube. In a 1970 Directory, 550 W. Idaho Street appears as a location for Apparatus Aviation, Defense Field Operations Department, Flight Propulsion, Light Military Electric, and Receiving Tube.

**Site 4. Enterprises NW Property**

See answers to 1(d), 1(e), and 1(f) above. In addition, the Enterprises NW Property was originally owned by Sundfelt Equipment Company from 1941 to 1945. From 1945 to 1972, GE leased the Enterprises NW property for use as its apparatus service shop. From 1972 to 2011, Enterprises NW owned the property and leased it to various tenants, including Roger’s Olympic Company, a steel casting, machining, and rail track manufacturing company, and VAE Nortrack, a rail parts manufacturer.

GE purchased the property on June 6, 2011 for the purposes of remediating it. GE sold the property on July 19, 2016 after completing the remediation.

The Enterprises NW Property was the subject of a voluntary environmental cleanup. In connection with this cleanup activity, there are numerous soil and groundwater investigation and remediation reports related to the property. For assessments related to the environmental conditions (e.g. soil, groundwater) of the Enterprises NW property and adjacent properties, refer to the attached Document Index.

**Site 7. 710 2<sup>nd</sup> Avenue**

This property is listed in a 1960 Diary and in a 1970 Business Directory under Apparatus Sales.

**Site 8. 5000-5002 East Marginal Way**

This property is listed in a 1956 GE diary under the GE Industrial Power Components Division and is specified as a District Sales Office. It also appears in the 1960 Diary and the 1970 Places of Business Directory with the following descriptions: Assembly-Components and Circuit Protective Devices.

- i. **Describe each release of materials at or from a Subject Property, including the type and quantity of the materials, the location of the release, the impacted media, and the response.**

**Response:**

GE objects to Request 1(h) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information:

GE’s current knowledge of the historical operations and materials used at the sites listed in its response to Request 1(d) is limited. Its knowledge about the Enterprises

NW property specifically is summarized in the documents specified in the Document Index as relevant to the Enterprises NW property.

- j. **Provide information on past dredging or future planned dredging in the EWOU.**

**Response:**

None of the properties that GE operated at within the study area were directly adjacent to the EWOU. They are surrounded by industrial properties and highway/railroad infrastructure and are unlikely to be dredged at any point in the future. To GE's knowledge, these properties were never dredged, but rather, were all land that was filled prior to GE's period of occupancy.

- k. **Provide all documents pertaining to the use, storage, or disposal of any hazardous substances, pollutants, or contaminants at the Subject Property.**

**Response:**

GE objects to Request 1(k) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information:

GE's current knowledge of historical handling of materials at the sites listed in its response to Request 1(d) is limited to information contained in the following documents: 13, 14, 19, 21, and 23–27.

**Site 4. Enterprises NW Property**

Responsive documents are attached as noted in the Document Index. Documents related to the disposal of hazardous substances during the demolition of Building A in 2013 and the disposal of hazardous substances during the remediation of the site in 2015 are included in the attached documents as Document Numbers 23 and 27.

- l. **Provide all information on electrical equipment used at the Subject Property, including transformers or other electrical equipment that may have contained polychlorinated biphenyls (PCBs).**

**Response:**

GE objects to Request 1(l) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information:

GE's current knowledge of the historical operations and equipment present at the sites listed in its response to Request 1(d) is limited to the following:

#### **Site 4. Enterprises NW Property**

The Enterprises NW property was used as an electrical equipment maintenance and repair shop. As such, it handled a broad variety of electrical equipment, including electrical transformers. The operations at this site are poorly understood given they ended in 1972, however, the Remedial Investigation and Feasibility Study Documents, listed in the Document Index describe some of the general activities based on the historic artifacts that were present.

- m. **Provide information on the type(s) of oils or fluids used for lubrication of machinery or other industrial purposes, and any other chemicals or products which are or may contain hazardous substances, pollutants, or contaminants which are or were used at the Subject Property.**

#### **Response**

GE objects to Request 1(m) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information:

GE's current knowledge of the historical use of oils or fluids at the sites listed in its response to Request 1(d) is limited to the following:

#### **Site 4. Enterprises NW Property**

UST records indicate heating oil and motor oil were present on the property. Some of these USTs were installed after GE vacated the property in 1972. Information responsive to this question may also be found in Document Numbers 25 and 27, and in response to Request 1(p).

- n. **Provide any Subject Property drainage descriptions plans or maps that include information about storm drainage which includes, but is not limited to, above or below surface piping, ditches, catch basins, manholes, and treatment/detention or related structures including outfalls. If available, also include information about connections to each sanitary sewer.**

#### **Response:**

GE objects to Request 1(n) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information:

GE's current knowledge of the historical operations and drainage pathways at the sites listed in its response to Request 1(d) is limited. Please see documents 12, 14, 19, 21, 23, 24, 26, 27, 29–33, and 37.

**Site 4. Enterprises NW Property**

Information on the historical drainage facilities that served the Enterprises NW property is summarized in Document Number 12 (2005 Aerial Photo). The historical drainage system for the Enterprises NW Property was removed as part of the remediation of the property in 2015. All catch basins and drain lines were removed on the ENW property and the adjacent ROW property. Replacement drainage facilities are documented in the 2016 Construction Report (Doc. No. 27) and updated by EF Holdings (J.H. Kelly) in 2018 and 2020 (Document Nos. 31–32).

- o. **With respect to past activities or operations at each Subject Property, provide copies of any stormwater or drainage studies, including data from sampling, conducted at the Subject Property. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans that may have been developed for different operations during Respondent's occupation of the Subject Property.**

**Response:**

GE objects to Request 1(o) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information:

GE's current knowledge of the historical operations and stormwater pathways at the sites listed in its response to Request 1(d) is limited to the following:

**Site 4. Enterprises NW Property**

See 1(n) above and other documents identified in the attached Index. SWPPPs are not available from the period of time that GE was on the site from 1945-1972. SWPPPs were not needed from 2011 to 2016 because no industrial activities occurred at that time. GE does not have SWPPPs or other documents from the periods of time that GE was not operating the site from 1972–2011 and from 2016–present.

- p. **Describe each underground storage tank present at any time on a Subject Property, including but not limited to the size and location of the tank, the materials stored in the tank, the time period of use, whether any material leaked from the tank, the type and quantity of leaked material, and the response to the leaked material.**

**Response:**

GE objects to Request 1(p) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information:

GE's current knowledge of the historical operations and underground tanks at the sites listed in its response to Request 1(d) is limited.

**Site 4. Enterprises NW Property**

The underground storage tanks that were present on the property, and removed as part of the remedial action activities, are listed on the table below. Two heating oil USTs were removed in 2015 as part of the property remediation and as detailed in:

- Site Assessment and UST Decommissioning Report (Amec Foster Wheeler, October 20, 2015) Doc. No. 25.
- Construction Report, Former Enterprises NW Property Remediation, Voluntary Cleanup Program NW 2117, Seattle, Washington, Amec Foster Wheeler Environment & Infrastructure, Inc., April 2016, Doc. No. 27.

Contaminated soil around the USTs was over-excavated and confirmation soil samples indicated that the extent of contamination was defined and limited; confirmation sample results are presented in both of the documents mentioned above.

Removal of four USTs and a drum were conducted during the time when GE was not a tenant or owner of the property.

UST ID or location	Contents	Capacity (gallons)	Install Date	Removal Date
Near NE corner of existing Bldg B	Motor Oil	6,000	1945	No documentation
N. of historic Bldg A	Oil	500–900	1978	1989
Near N property line	Diesel	500–900	Approx. 1978	1989
Near N. property line	Leaded Gas	<500	Approx. 1978	1989
Near NE corner of historic Bldg A	Oil	55 (Drum)	Unknown	1974
UST-1 N. of historic Bldg A	Heating Oil	550	Unknown	2015
UST-2 N. of historic Bldg A	Heating Oil	370	Unknown	2015

- q. **Provide the names and last known address of any tenants or lessees, the dates of their tenancy and a description of the activities or operations they conducted while present at the Subject Property.**

**Response:**

GE objects to Request 1(q) as overbroad and unreasonably burdensome. Subject to these objections, GE provides the following information:

GE's current knowledge of the historical operations and tenancies at the sites listed in its response to Request 1(d) is limited. See response 1(f) above.

- r. **If Respondent, its parent corporation, subsidiaries or other related or associated companies have filed for bankruptcy, provide:**
- i. **the U.S. Bankruptcy Court in which the petition was filed;**
  - ii. **the docket numbers of such petition;**
  - iii. **the date the bankruptcy petition was filed;**
  - iv. **whether the petition is under Chapter 7 (liquidation), Chapter 11(re-organization), or other provision; and**
  - v. **a description of the current status of the petition.**

**Response:**

General Electric Company, its subsidiaries and associated companies have never filed for bankruptcy.

- s. **If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous substances, pollutants, or contaminants, or transportation of hazardous substances, pollutants, or contaminants to or from, the Subject Property.**

**Response:**

**Enterprises NW**

Tom Antonoff  
tom.antonoff@ge.com  
Phone Number: 518.338.4142  
General Electric Company  
1 River Road – Bldg 5-7W  
Schenectady, NY 12345 USA

Kathleen Goodman, LG., LHg., RG.  
Principal Hydrogeologist  
Wood PLC  
600 University Street, #600  
Seattle, WA 98101 USA  
Direct: 206-342-1780

**2. Financial Information**

- a. **Provide true and complete copies of all federal income tax documents, including all supporting schedules, for 2015, 2016, 2017, 2018, and 2019. Provide the federal Tax Identification Number and, if documentation is not available, explain why in detail.**

**Response:**

GE specifically objects to Paragraph 2(a) of the Request because this request is overbroad and unreasonably burdensome.

We are providing the most recent Annual Report for General Electric Company (Document No. 36). The information set forth in the Annual Report provides the relevant information sought by Question 2 and its subparts.

To the extent that the U.S. EPA requires additional information as to the financial status of the General Electric Company, please advise what further information is necessary to address the scope of CERCLA 104(e) information.

Although CERCLA § 104(e) authorizes U.S. EPA's inquiry into information relating to the ability of a person to pay for or perform a cleanup, the request concerning GE's legal and financial information, which would include many voluminous schedules and attachments, is unreasonably burdensome, over-inclusive and unnecessary for purposes of determining GE's ability to contribute funds for remedial action.

U.S. EPA has worked with GE on environmental matters across the nation. U.S. EPA has previously been provided with substantial amounts of information concerning GE's financial ability to address environmental remediation.

- b. **Provide Respondent's financial interest in, control of, or that Respondent is a beneficiary of any assets (in the U.S. or in another country) that have not been identified in the federal tax returns or other financial information to be presented to the EPA. If there are such assets, identify each asset by type of asset, estimated value, and location.**

**Response:**

See 2(a) above

- c. **If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or other-wise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:**
- i. **a general statement of the nature of relationship, indicating whether the affiliated entity had, or exercised, any degree of control over the daily**

- operations or decision-making of Respondent's business operations at the Subject Property;
- ii. the dates such relationship existed;
- iii. the percentage of ownership of Respondent that is held by such other entity(ies);
- iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- v. providing any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of Respondent associated with the Subject Property or the EWOU; and
- vi. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total as-sets and total current assets, total liabilities and total current liabilities, networking capital (or net current assets), and net worth.

**Response:**

GE specifically objects to Request 2(c) on the grounds that it seeks information that is irrelevant, overbroad, unduly burdensome, and seeks information that may be found in public records, SEC filings, and New York Secretary of State records, which are already available to U.S. EPA.

Without waiving these objections, General Electric Company states that it is not now, nor has it ever been, a subsidiary of, otherwise owned, controlled by, or affiliated with another corporation or entity.

**3. Insurance Coverage**

- a. Provide copies of all property, casualty and/or liability insurance policies, and any other insurance contracts referencing the Subject Property' or EWOU and/or Respondent's business operations (including, but not limited to, Comprehensive General Liability, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies). Include, without limitation, all primary, excess, and umbrella policies which could be applicable to costs of environmental investigation and/or cleanup and include the years such policies were in effect.
- b. If there are any such policies from question "5a" above which existed, but for which copies are not available, identify each such policy by providing as much of the following information as possible:
  - i. the name and address of each insurer and of the insured;



- ii. the type of policy and policy numbers;
  - iii. the per occurrence policy limits of each policy; and
  - iv. the effective dates for each policy.
- c. Identify all insurance brokers or agents who placed insurance for Respondent at any time during the period being investigated, as identified at the beginning of this request and identify the time period during which such broker or agent acted in this regard.
- d. Identify all communication and provide all documents that evidence, refer, or relate to claims made by or on behalf of Respondent under any insurance policy in connection with the Subject Property or EWOU. Include any responses from the insurer with respect to any claims.
- e. Identify any previous settlements with any insurer in connection with the Subject Property or EWOU, or for any claims for environmental liabilities during the time period under investigation. Include any policies surrendered or cancelled by Respondent or insurer.
- f. Identify any and all insurance, accounts paid or accounting files that identify Respondent's insurance policies.
- g. Identify Respondent's policy with respect to document retention.

**Response:**

GE specifically objects to Paragraph 3 of the Request and all of its subparts because such requests are overbroad and unreasonably burdensome.

Subject to and without waiving these objections, GE responds that it maintains a comprehensive insurance program, covering the years at issue in this matter through a number of different insurance policies across multiple lines issued by various insurers. The applicability of any of GE's policies to the subject matter of this Request depends on the terms, conditions and exclusions of those policies.

GE has settled and/or released certain of its historical insurance policies with respect to certain environmental liabilities. With respect to insurance brokers, GE placed some of its insurance directly and placed other policies through different brokers.

If at some point GE's ability to pay becomes an issue, GE will provide additional information.

GE's current document retention policy is attached. This policy governs what documents GE Corporate retains or disposes at this time. It is not necessarily the same as the retention policy that governed documents pertaining to each of the Seattle-area facilities at the time those documents were created.

**4. Compliance with This Request**

- a. Describe all sources reviewed or consulted in responding to this Request, including, but not limited to:**
- i. the name and current job title of all individuals consulted; and**
  - ii. the location where all documents reviewed are currently kept.**

**Response:**

GE conducted a thorough investigation of all internal records that it could identify as reasonably likely to be relevant to answering the questions asked and the properties referenced. It also consulted public resources to identify properties where GE may have operated at times in the distant past. GE is a large decentralized company. It would be impracticable and unreasonable to search all possible locations for the broad classes of documents requested. GE's searches were also hampered by COVID, because many locations of hard copy records, both internal to the Company and external, such as the Seattle Public Library's historical archive, were inaccessible.

- i. The persons consulted included:
  - 1. Marian Whiteman, Executive Counsel, EHS Brownfields Program, GE Corporate
  - 2. Lisa Harber, GE Gas Power, Global Supply Chain
  - 3. Ed Jamison, Senior EHS Manager, GE Oil & Gas
  - 4. Dawn Varracchi-Ives, Legacy Site Project Manager, GE Corporate
  - 5. Andrew Graham, Senior Advanced Manufacturing, GE Oil & Gas
  - 6. Baya Atmani, Human Resource Manager, GE Corporate
  - 7. Angelica Todd, Paralegal, GE Corporate
- ii. The records reviewed are located at:
  - 1. King County Tax Assessor's online parcel viewer database, <https://blue.kingcounty.com/Assessor/eRealProperty/default.aspx>.
  - 2. Puget Sound Regional Archives
  - 3. King County Public Records.
  - 4. Various repositories for electronic files and employee records throughout the Company.
  - 5. Hard copies stored off-site at various Iron Mountain locations.

### E. DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct to the best of my knowledge.

Executed on August 28, 2020

  
Signature

Thomas D. Antonoff

\_\_\_\_\_  
Type or Print Name

Senior Project Manager – Environmental Remediation  
Global Operations, Environment, Health & Safety

\_\_\_\_\_  
Title

Mailing Address:

General Electric Company  
1 River Road – Bldg 5-7W  
Schenectady, NY 12345 USA

General Electric – East Waterway Operable Unit, Harbor Island Site  
Index of Documents for EPA's 104(e) Request  
August 31, 2020

Doc. No.	Document Name / Information	Bates Range	Relevant to Property	Responsive to Request
1.	Map of Historic GE sites	GE000001	All	1(d), 1(f)
2.	Line Drawing	GE000002	Site 4. Enterprises NW Property	1(f), 1(g)
3.	1944-Aerial	GE000003	Site 4. Enterprises NW Property	1(f), 1(g)
4.	1946-Aerial	GE000004	Site 4. Enterprises NW Property	1(f), 1(g)
5.	1950 Sanborn Maps with Notations	GE000005-000010	Site 1. 2 S. Hanford; Site 2. 1212 1 <sup>st</sup> Ave S; Site 4. Enterprises NW; Site 5, 1508 4 <sup>th</sup> Ave S.; Site 6. 440 S Holgate	1(f)
6.	1956 GE Diary	GE000011	Site 8. 5000-5002 E Marginal Way	1(h)
7.	1960 GE Diary	GE000012-000013	Site 1. 2 S. Hanford; Site 2. 1212 1 <sup>st</sup> Ave S; Site 3, 550 S Idaho St; Site 4. Enterprises NW; Site 4. Enterprises NW; Site 7. 710 2 <sup>nd</sup> Ave; Site 8. 5000-5002 E Marginal Way.	1(h)
8.	1969 Sanborn Maps with Notations	GE000014-000020	Site 1. 2 S. Hanford; Site 2. 1212 1 <sup>st</sup> Ave S; Site 4. Enterprises NW; Site 5, 1508 4 <sup>th</sup> Ave S.; Site 6. 440 S Holgate	1(f)
9.	1970 GE Directory	GE000021-000023	Site 1. 2 S. Hanford; Site 2. 1212 1 <sup>st</sup> Ave S; Site 3, 550 S Idaho St; Site 4. Enterprises NW; Site 4. Enterprises NW; Site 7. 710 2 <sup>nd</sup> Ave; Site 8. 5000-5002 E Marginal Way.	1(h)
10.	Property Summary	GE000024-000025	Site 2. 1212 1 <sup>st</sup> Ave S	1(d), 1(f)
11.	Property Summary	GE000026-000027	Site 6: 440 Holgate Street	1(d), 1(f)
12.	Enterprises NW 2005 Aerial Photo	GE000028	Site 4. Enterprises NW Property	1(f), 1(n)

<b>Doc. No.</b>	<b>Document Name / Information</b>	<b>Bates Range</b>	<b>Relevant to Property</b>	<b>Responsive to Request</b>
13.	Phase II Environmental Site Assessment, 3422 1st Avenue South (Site A) and 151 South Horton Street (Site B), Seattle, Washington, GeoEngineers, June 1, 2006, with 2007 Addendum	GE000029-000094	Site 4. Enterprises NW Property	1(d), 1(f), 1(h)(ii), 1(k), 1(p).
14.	Comprehensive Focused Site Characterization Report, AMEC, September 2008	GE000095-000572	Site 4. Enterprises NW Property	1(d), 1(f), 1(k), 1(n)
15.	Groundwater Monitoring Report, June 2009, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington, AMEC, November 2009.	GE000573-000613	Site 4. Enterprises NW Property	1(f)
16.	Groundwater Monitoring Report, September 2009, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington, AMEC, November 2009.	GE000614-000664	Site 4. Enterprises NW Property	1(f)
17.	Groundwater Monitoring Report, April 2010, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington, AMEC, October 2010.	GE000665-000728	Site 4. Enterprises NW Property	1(f)
18.	2011 Enterprises NW Deed	GE000729-000732	Site 4. Enterprises NW Property	1(d), 1(f)
19.	Remedial Investigation Report, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington AMEC, 2011.	GE000733-001038	Site 4. Enterprises NW Property	1(d), 1(f), 1(k), 1(n), 1(p)
20.	Environmental, Health & Safety Related Records Retention Policy (Revised September 2011)	GE001039-001044	All sites	3(g)

<b>Doc. No.</b>	<b>Document Name / Information</b>	<b>Bates Range</b>	<b>Relevant to Property</b>	<b>Responsive to Request</b>
21.	Feasibility Study and Disproportionate Cost Analysis, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington. AMEC, April 2013.	GE001045-001159	Site 4. Enterprises NW Property	1(d), 1(f), 1(k), 1(n)
22.	Groundwater Monitoring Report: December 2012 Sampling Event and First Quarter 2013 Groundwater Measurements, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington, AMEC, April 2013.	GE001160-001242	Site 4. Enterprises NW Property	1(f)
23.	Demolition Closeout Report, Building A Demolition, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington, AMEC, March 2014.	GE001243-002835	Site 4. Enterprises NW Property	1(f), 1(k), 1(n), 1(o)
24.	Agency Draft Cleanup Action Plan, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington, AMEC, May 2014.	GE002836-002977	Site 4. Enterprises NW Property	1(f), 1(k), 1(n), 1(o)
25.	Site Assessment and UST Decommissioning, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington, Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler), October 22, 2015	GE002978-003081	Site 4. Enterprises NW Property	1(f), 1(k), 1(o), 1(p)
26.	Obert Construction Report, Obert Marine Property. Amec Foster Wheeler. January 22, 2016	GE003082-003520	Site 4. Enterprises NW Property	1(f), 1(k), 1(n)

<b>Doc. No.</b>	<b>Document Name / Information</b>	<b>Bates Range</b>	<b>Relevant to Property</b>	<b>Responsive to Request</b>
27.	Construction Report, Former Enterprises NW Property Remediation, Voluntary Cleanup Program NW 2117, Seattle, Washington, Amec Foster Wheeler, April 2016.	GE003521-007332	Site 4. Enterprises NW Property	1(f), 1(k), 1(n), 1(o), 1(p)
28.	2016 Enterprises NW Deed	GE007333-007335	Site 4. Enterprises NW Property	1(d), 1(f)
29.	Groundwater Monitoring Report for 2016, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington. Amec Foster Wheeler. 2017.	GE007336-008074	Site 4. Enterprises NW Property	1(f), 1(n)
30.	Groundwater Monitoring Report for 2017, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington. Amec Foster Wheeler, 2018.	GE008075-008653	Site 4. Enterprises NW Property	1(f), 1(n)
31.	J.H. Kelly Seattle Office Building Civil Design Drawings	GE008654-008673	Site 4. Enterprises NW Property	1(n)
32.	J.H. Kelly Seattle Office Building Grading and Drainage Plan Drawing	GE008674	Site 4. Enterprises NW Property	1(n)
33.	Groundwater Monitoring Report for 2018, Enterprises NW Property, 3422 1st Avenue South, Seattle, Washington. Wood, 2018.	GE008675-009146	Site 4. Enterprises NW Property	1(f), 1(n)
34.	2019 Soil Sample Locations	GE009147	Site 4. Enterprise NW Property	1(f)
35.	July 2019 Tables – Soil Analytical Results	GE009148-009161	Site 4. Enterprise NW Property	1(f)
36.	GE 2019 Annual Report	GE009162-009301	All Sites	2(a)
37.	Groundwater Monitoring Report for 2019 (one sampling event), Stantec. 2020	GE009302-009381	Site 4. Enterprises NW Property	1(f), 1(n)